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9

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 EASTERN-RIVERSIDE DIVISION
13

14 **L.C.,**

15 Plaintiffs,

16 v.
17

18 **STATE OF CALIFORNIA, et al.,**

19 Defendants.
20

No. 5:22-cv-00949 KK-SHKx

**STATE DEFENDANTS' RESPONSE
TO PLAINTIFFS' EX PARTE
APPLICATION RE: MINORS'
COMPROMISE**

Judge: Honorable Kenly Kiya Kato
Action Filed: June 7, 2022

21
22 The State Defendants do not generally oppose Plaintiffs' ex parte application
23 for approval of the minors' compromise. However, the State Defendants request
24 four days, up to and including July 25, 2025, to adequately review the annuity
25 documents that Plaintiffs' counsel only provided on the late afternoon of July 18,
26 2025.

27 On July 18, with less than a day's notice of the ex parte application, the
28 undersigned expressed concerns to Plaintiffs' counsel about the language in the

1 Annuity Attachment, the need to review the Qualified Assignment, and other
2 concerns that, based on the undersigned's experience, commonly arise with certain
3 wording in the annuity documents that the State, by and through the California
4 Highway Patrol (CHP), will need to execute once the Minor's Compromise. In
5 addition, CHP legal staff will also need to review the annuity documents to confirm
6 they can comply with their terms.

7 For reasons not conveyed to the undersigned, Plaintiffs' counsel only provided
8 the Annuity Attachment with the application. Although Plaintiffs' counsel changed
9 the attached to address the State Defendants' concerns, the other annuity documents
10 were only provided on July 18 after the undersigned requested them. The CHP still
11 has not had time to review the annuity documents. For this reason, the State
12 Defendants cannot agree to the ex parte application until they have completed their
13 review of the annuity documents.

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15 Dated: July 21, 2025

Respectfully submitted,

16 ROB BONTA
17 Attorney General of California
18 NORMAN D. MORRISON
Supervising Deputy Attorney General

19 */s/ Diana Esquivel*

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